

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS  
(Jointly Administered)

**AAFAF'S WITNESS LIST TO BE OFFERED IN CONNECTION WITH PLAN OF  
ADJUSTMENT CONFIRMATION**

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) respectfully submits its witness list in accordance with the *Amended Order Establishing Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (ECF No. 18394) (“Procedures Order”)<sup>2</sup> and the *Order Regarding Procedures for Hearing on Confirmation of Plan of Adjustment* (ECF No. 18502) (“Hearing Procedures Order”).

**AAFAF’s Witness List**

1. Pursuant to the Procedures Order, the Court directed the parties to file their preliminary fact witness lists and serve their opening expert disclosures by September 6, 2021,<sup>3</sup> serve their opening expert reports by September 13, 2021, and file their witness lists by October 22, 2021. Procedures Order at 4.

2. Solely to the extent that the Plan goes forward in its current form, AAFAF does not intend to call any witnesses or submit any witness declarations in connection with the Confirmation Hearing. In lieu of calling any witnesses at a hearing on the Plan in its current form, AAFAF intends to submit a statement of facts to be stipulated to with the Oversight Board. In the event that there is a hearing on such Plan, AAFAF will not submit any direct testimony. AAFAF reserves all rights in connection with a confirmation hearing on any amended plan the Board may propose.

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<sup>2</sup> Capitalized terms not defined have the meaning ascribed in the Procedures Order.

<sup>3</sup> The Procedures Order directed the Debtors to file their preliminary fact witness list by August 3, 2021.

Dated: October 22, 2021  
San Juan, Puerto Rico

Respectfully submitted,

**O'MELVENY & MYERS LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case.

/s/ Luis C. Marini-Biaggi  
Luis C. Marini-Biaggi